

Honorable Judge Benjamin H. Settle  
Honorable Judge David W. Christel

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JESUS CHAVEZ FLORES,

Plaintiff,

v.

UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT, et al,

Defendants.

No. 3:18-cv-05139-BHS-DWC

DECLARATION OF  
STEVEN HSIEH

### **DECLARATION OF STEVEN HSIEH**

I, Steven Hsieh, declare as follows:

1. I am over the age of eighteen, have personal knowledge of the matters herein, and am competent to testify in this case.

2. I am a journalist currently employed by the Phoenix New Times, in Phoenix, Arizona. In the past, I have also worked as a News Editor for the Stranger, in Seattle, Washington; as a reporter for the Santa Fe Reporter, in Santa Fe, New Mexico; as a News Blogger for The Nation magazine; as an Editorial Assistant at AlterNet; in Editorial and Production work at Newsy.com; and as a freelance reporter. I have B.A. in Journalism and English from the University of Missouri-Columbia.

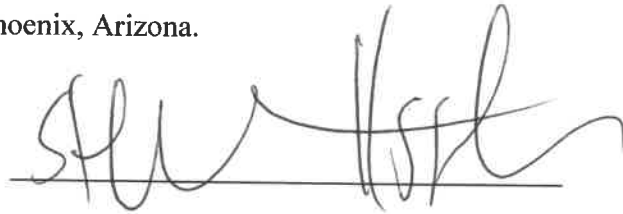
3. On June 29, 2018, in the course of my work as a journalist, I viewed a video filed by the GEO Group, Inc. in the lawsuit, Jesus Chavez Flores v. United States Immigration and Customs Service, et al., No. 3:18-cv-05139-BHS-DWC. The video that I viewed is the one that the GEO Group, Inc. has moved to seal.

4. I requested via phone to see the video at the federal courthouse for the Western District of Washington in Tacoma, Washington. At the courthouse, a clerk provided me a laptop to view the video in the clerk's office. I watched it several times in the clerk's office.

5. Open access to documents and video such as the one in question, particularly in the context of civil rights lawsuits, is critical to my work as a journalist to educate the public as a whole.

I declare under penalty of perjury of the laws of the United States of America and the State of Arizona that the foregoing is true and correct.

DATED this 8 day of October 2018, at Phoenix, Arizona.

A handwritten signature in black ink, appearing to read 'Steven Hsieh', is written over a horizontal line.

STEVEN HSIEH

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record who receives CM/ECF notification.

DATED this 10th day of October, 2018.

By: s/ Theresa M. DeMonte  
Daniel M. Weiskopf, WSBA No. 4941  
Theresa M. DeMonte, WSBA No. 43994